

Case 7:19-mj-11740-UA Document 18 Filed 06/26/20 Page 1 of 1

Federal Defenders
OF NEW YORK, INC.

David E. Patton
Executive Director
and Attorney-in-Chief

USDC SDNY
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Susanne Brody
Attorney in Charge
White Plains

June 26, 2020

The Honorable Paul E. Davison
Magistrate Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601-4150

Re: United States v. Charles Hustis
19 Mag 11740

Mr. Hustis may use a computer as needed, so long as it occurs in defense counsel's office and under defense counsel's supervision.

APPLICATION GRANTED

Hon. Paul E. Davison, U.S.M.J.

6/26/20

Dear Honorable Davison:

I hope this letter finds you well. I am writing on behalf of Charles Hustis and to ask that you modify the terms of his release for one day so that he may use a computer at my office to "virtually" meet with an expert. As background, Mr. Hustis was charged with violating 18 U.S.C. § 2422(b) on December 16, 20020. That same day, Mr. Hustis was released to home-detention and the terms of his release specifically prohibit him from using a computer or from connecting to the internet. In preparation for Mr. Hustis's defense, I ask that Your Honor please modify the terms of his release for one day so that he may use a computer at my office to communicate with an expert.¹ If approved, Mr. Hustis would travel to my office and I would setup a laptop in a large conference room which will enable Mr. Hustis to communicate via video with the expert. Of course, I will supervise Mr. Hustis' use of the computer and I will ensure that he only uses the computer to communicate with the expert. I expect that, if approved, this would occur sometime between June 30th and July 8th – most likely on July 1, 2020.

I have spoken to Pretrial Officer Leo Barrios. Mr. Barrios does not object to this request and he notes that Mr. Hustis has been compliant with the terms of his release. I have also spoken to AUSA Nicholas Bradley, and he does not object to this request.

Thank you very much for your consideration.

Sincerely,

Benjamin Gold

¹ Due to the COVID-19 epidemic, this expert is not currently willing to meet with Mr. Hustis in person.